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Northern California Council

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CALFED BAY-DELTA PROGRAM
1416 Ninth Street, Suite 1155
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Subject: Comments on Cal-Fed Revised EIR

I offer the following personal comments on the Cal-Fed Bay Delta Program Revised EIR/S. These are in addition to more extensive written comments which will be submitted by NCCFFF.

I am seriously concerned that the program as currently defined will fall far short of what is required to achieve the restoration of the Delta ecosystem as envisioned at the program's inception in 1994, and to meet the state and federal government's legal responsibility to the citizens of this state to restore the estuary and its fishery resources. Here are nine specific areas of deficiency.

- **Fails to identify the amount and source of water required for restoration:** The key shortcoming of this EIR/S is that it does not require Cal Fed to define and obtain the amount of water the estuary and its fisheries require to achieve and sustain a target levels of on a long-term basis - much less restoration to recent historical levels of abundance. The document needs to specify exactly how much water, above what is currently made available, will be allocated to restore the estuary's ecosystem and the public fishery resources dependent upon such flows. The EIR/S fails to establish a clear plan of action and a deliverable assurance on how and when such water will be acquired and made available. While some good initial work has been done on the ecosystem restoration plan, all the plans and adaptive management in the world cannot bring back the fish and the ecosystem without the necessary water.
- **Increased targets for steelhead:** Targets for restoring steelhead populations need to be increased in the long term to greater than 40,000 fish. While a reasonable interim target, a goal of 40,000 fish is too low when compared to population in existence before the advent of California water projects.
- **Specific remedies for steelhead and salmon:** I applaud the salmon and steelhead restoration project on Butte Creek and am encouraged by plans underway for Battle Creek and Clear Creek. The plan must include additional specific, meaningful projects on rivers such as the Upper Yuba above Englebright Dam and the San Joaquin. This would include removal of barrier dams, providing functional fish access above current man made obstructions, increase in stream flows, temperature targets and monitoring, and/or the acquisition and restoration of habitat for fish and wildlife.

- **Specific remedies for striped bass:** The plan should provide adequate flows to restore the striped bass fishery which has been devastated by water export from the estuary. Such actions must be closely coordinated with the restoration efforts for salmon and steelhead.
- **Limit diversions:** The plan should cap and eventually reduce diversions from the delta. Increased flows are required for habitat preservation and restoration. The CalFed EIR/S preferred alternative proposes creation of an "enlarged through Delta" export system to fix the estuary. The Document should be revised to explain in detail how increasing the size of the export system will lead to the restoration of the estuary instead of greater damage to the estuary and its fisheries, and further to include alternatives which exclude increased diversions.
- **No new dams, reservoirs, or canals:** No commitments for construction of these facilities should be made at least during Phase I. This would permit alternative solutions, including conservation, a chance to work and provide time to verify consumption projections.
- **Those who benefit should pay:** The plan should include steps to insure that the real cost of water supply is born by those who benefit from it. Any argument that new dams or diversions are required for environmental purposes is false. Previous dam construction was heavily subsidized by taxpayers and led to the decline of our fisheries.
- **Lacks emphasis on water conservation:** The plan does not adequately reflect the full potential for water conservation and efficiency to meet California's needs. The plan fails to include required emphasis on conservation through groundwater management, household conservation, agricultural conservation, drinking water treatment, including water reclamation, dual systems in new developments, and better waste water treatment facilities. All additional water conserved or developed should be dedicated to environmental restoration of the estuary and placed in the Environmental Water Account.
- **Enforce pollution limits:** The current EIR/S fails to commit to stopping water pollution at its source and to establish and enforce water quality standards that actually protect the entire food web of the estuary and its tributaries. Much of the current pollution is so toxic that it kills or keeps a substantial part of the lower food web from developing. This in turn reduces the overall productivity of the estuary.

Respectfully submitted,



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